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By ECF

Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

February 9, 2023

MEMORANDUM ENDORSED

In Re: *New York City Policing During Summer 2020 Demonstrations*,
No. 20 Civ. 8924 (CM) (GWG)
This filing is related to all cases

Your Honor:

I am a Senior Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and I am among counsel for the defense in the above-referenced matter. Defendants write to respectfully request a two-day extension from February 10, 2023, to February 14, 2023, to submit a sworn statement as referenced in the Court's Order dated January 23, 2023.

On January 23, 2023, the Court ordered that defendants, at their option, must either provide a sworn statement or a 30(b)(6) witness regarding, "what video within the control of any City department (including, of course, the NYPD) is normally sought by the NYPD in conducting investigations of incidents occurring outdoors." (Dkt. No. 823). Defendants have chosen to provide a sworn statement and have identified the declarant. The extension is necessary, because the declarant is still in the process of drafting the sworn statement. Further, the declarant is unavailable on the due date for the declaration. One previous extension was requested by defendants on January 27, 2023, (Dkt. No. 830) which was granted. Defendants sought a response by close of business today from plaintiffs at 1:35 pm today, but no response has been provided as of the time of filing.

Accordingly, defendants respectfully request until February 14, 2023, to provide the sworn statement. Thank you for your consideration of this matter.

Respectfully submitted,

Amy Robinson s/
Amy Robinson
Senior Counsel

cc: ALL COUNSEL (via ECF)

Extension to February 14, 2023, granted.

So Ordered.


GABRIEL W. CORENSTEIN
United States Magistrate Judge

February 10, 2023